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Attorney for Creditor,

U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST, its successors and assigns

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:

Monte Keith Woods

DEBTORS,

U.S. BANK TRUST NATIONAL ASSOCIATION,

AS TRUSTEE OF THE IGLOO SERIES III

TRUST CREDITOR,

S CASE NO.: 14-44925-elm13

CHAPTER 13

CHAPTER 13

RESPONSE TO NOTICE OF FINAL CURE

TO ALL PARTIES IN INTEREST AND TO THEIR ATTORNEYS OF RECORD:

U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST, ("Secured Creditor") in the above-entitled Bankruptcy proceeding, hereby submits the following reply to Notice of Final Cure ("Notice") filed on January 9, 2020, by the Chapter 13 Trustee, Pam Bassel.

Secured Creditor is entitled to receive payments pursuant to a Promissory Note which matures on February 8, 2038 and is secured by a Deed of Trust on the subject property commonly known as 2303 Stillmeadow Drive, Arlington TX 76014(the "**Property**").

Secured Creditor agrees that all pre-petition arrears have been cured.

Secured Creditor does not agree that the Debtor, is current post-petition. The Debtor is due for the November 2019 post-petition monthly mortgage payment and all subsequent payments for a total post-petition default as follows:

Date	Payment Amount
11/1/2019	\$1,243.19
12/1/2019	\$1,243.19
1/1/2020	\$\$1,243.19
Total	\$3,729.57

A true and correct copy of the post mortgage modification payment history is attached hereto as **Exhibit** "A".

Respectfully submitted,

/s/ Kristin A. Zilberstein Kristin A. Zilberstein, Esq. State Bar No.: 24104960 600 E John Carpenter Fwy., Ste. 200

Irving, TX 75062 Tel: (949) 427-2010

kzilberstein@ghidottilaw.com

COUNSEL FOR SECURED CREDITOR

Exhibit "A"



Payment Changes					
Date	P&I	Escrow	Total	Notice Filed	
5/1/2019	\$772.73	\$470.46	\$1,243.19	Per Loan Mod	
		\$0.00		NOPC	
		\$0.00		NOPC	
		\$0.00		NOPC	
		\$0.00			
		\$0.00			

Loan Information					
	Redacted				
Borrower	Woods				
BK Case #	14-44925				
Date Filed	12/5/2014				
First Post Petition					
Due Date					
POC Covers	Loan Mod entered 5/1/19				

Date	Amount Rcvd	Post Pet Due Date	Contractual Due Date	Amt Due	Over/Short	Suspense Credit	Suspense Debit	Suspense Balance	POC Arrears Credit	POC Debit	POC Suspense Balance	POC Paid to Date	Comments
5/31/2019	\$1,243.20	5/1/2019	5/1/2019	\$1,243.19	\$0.01	\$0.01		\$0.01			\$0.00	\$0.00	
8/2/2019	\$1,250.00	6/1/2019	6/1/2019	\$1,243.19	\$6.81	\$6.81		\$6.82			\$0.00	\$0.00	
8/30/2019	\$1,300.00	7/1/2019	7/1/2019	\$1,243.19	\$56.81	\$56.81		\$63.63			\$0.00	\$0.00	
10/15/2019	\$1,243.19	8/1/2019	8/1/2019	\$1,243.19	\$0.00			\$63.63			\$0.00	\$0.00	
11/29/2019	\$1,250.00	9/1/2019	9/1/2019	\$1,243.19	\$6.81	\$6.81		\$70.44			\$0.00	\$0.00	
12/27/2019	\$1,250.00	10/1/2019	10/1/2019	\$1,243.19	\$6.81	\$6.81		\$77.25			\$0.00	\$0.00	
					\$0.00			\$77.25			\$0.00	\$0.00	
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1	<u>CERTIFICATE OF SERVICE</u>								
2	On January 27, 2020 , I served the foregoing documents described as RESPONSE TO								
3	NOTICE OF FINAL CURE, on the following individuals by electronic means thorugh the								
5	Court's ECF program:								
6	COUNSEL FOR DEBTOR CHAPTER 13 TRUSTEE								
7	Christopher Marvin Lee Pam Bassel ecf@leebankruptcy.com fwch13cmecf@fwch13.com								
8	U.S. TRUSTEE								
9	United States Trustee ustpregion06.da.ecf@usdoj.gov								
10 11	I declare under penalty of perjury under the laws of the United States of America								
12	that the foregoing is true and correct.								
13	/s/ Enrique Alarcon Enrique Alarcon								
14	On January 27, 2020 , I served the foregoing documents described as RESPONSE TO								
15									
16	NOTICE OF FINAL CURE, on the following individuals by depositing true copies thereof								
17	in the United States mail at Santa Ana, California enclosed in a sealed envelope, with postage								
18	paid, addressed as follows:								
19	DEBTOR Martin Wards								
20	Monte Keith Woods 2303 Stillmeadow Drive								
21	Arlington, TX 76014								
22	I declare under penalty of perjury under the laws of the United States of America								
23	that the foregoing is true and correct.								
24	/s/ Enrique Alarcon								
25	Enrique Alarcon								
26									
27									
28									